

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**PAUL J. MANAFORT, JR. and  
RICHARD W. GATES III,**

**Defendants.**

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**Crim. No. 17-201 (ABJ/DAR)**

**DEFENDANT RICHARD W. GATES III'S MOTION SEEKING PERMISSION TO  
LEAVE HOME CONFINEMENT FOR SPECIFIC FAMILY ACTIVITIES ON  
SATURDAY, NOVEMBER 11, 2017 AND SUNDAY, NOVEMBER 12, 2017**

Richard W. Gates III, by and through counsel, hereby moves this Court for permission to leave home confinement so that he may take his children to specific activities on Saturday, November 11, 2017 and Sunday, November 12, 2017. Counsel has been working diligently with the United States to reach a joint proposal for bail conditions and has now submitted a proposed package with supporting documents for consideration to the United States which includes the pledging of his personal residence, IRA account, and five individuals willing to act as sureties for his bail. However, counsel anticipates that the United States may be unable to finalize its position before the close of business today and that this Court would lack sufficient time to consider and rule on such joint proposal before the close of business today. Accordingly, counsel seeks this Court's permission for Mr. Gates to assist with his children's activities (including church attendance from 8:30 am to 11:00 am on Sunday, November 12) over the weekend between the hours of 9:30 a.m. to 1:30 p.m. on Saturday, November 11 and 8:30 a.m. to 4:00 p.m. on Sunday, November 12. Mr. Gates would notify Pre-Trial Services of his specific whereabouts and hours out of the house as he previously did when this Court granted him identical permission last weekend.

Mr. Gates fully complied with his pretrial release obligations then and he will continue to do so if this court grants the present motion. The United States, which did not oppose the previous weekend's family activities, now opposes this motion, but Mr. Gates submits that the United States will not be prejudiced by the granting of this motion nor has Mr. Gates suddenly become a greater risk of flight this weekend vis-à-vis last weekend.

WHEREFORE, Defendant Gates hereby respectfully moves this Court for permission to leave home confinement so that he may attend his children's activities over the weekend.

Respectfully submitted,

/s/Shanlon Wu

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